

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
Dallas Division**

CHARLENE CARTER, Plaintiff, v. SOUTHWEST AIRLINES CO., AND TRANSPORT WORKERS UNION OF AMERICA, LOCAL 556, Defendants.	Civil Case No. 3:17-cv-02278-X
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PLAINTIFF'S WITNESS LIST

Pursuant to this Court's May 24, 2022 Amended Scheduling Order and Local Rule 26.2(b) (as modified) Plaintiff Charlene Carter submits her list of witnesses as follows:

Name	Summary of Testimony	Whether Deposed	Testimony at Trial
Charlene Carter	Charlene Carter is the Plaintiff. She will testify about her activities opposing the union, her religious beliefs and practices, and her social media activities. Carter will also testify about Southwest's disciplinary investigation. She will also testify about her claims and damages.	Yes	Probable
Jeanna Jackson	Jeanna Jackson was a Southwest flight attendant who led the effort to recall the Local 556 Executive Board, including Local 556 President Audrey Stone. She will testify about the Recall Effort,	No	Probable

	Local 556 officers' and members' reporting her for discipline, and Southwest's disciplinary investigations in which she was involved.		
Mike Sims	Mike Sims was Defendant Southwest's Director of Inflight Relations. He will testify about Southwest's investigation that led to Carter's termination and the decision to terminate Carter's employment.	Yes	Probable
Ed Schneider	Ed Schneider was Defendant Southwest's Denver Base Manager, and Charlene Carter's supervisor. He will testify about Southwest's investigation that led to Carter's termination and the decision to terminate Carter's employment.	Yes	Probable
Audrey Stone	Audrey Stone was Defendant Local 556's President. She will testify about how the union responded to social media discipline during her tenure, preparations and planning for the Women's March event, the union's participation in the Women's March, and social media activity regarding the Women's March. Stone will also testify about reporting Charlene Carter's Facebook videos and messages to Southwest, and her participation in Southwest's investigation of Charlene Carter.	Yes	Probable

Jessica Parker	Jessica Parker was Defendant Local 556's Working Women's Committee Chair and Executive Board Member. She will testify about the union's participation in the Women's March, preparations and planning for the Women's March, the union's participation in the Women's March, and social media activity regarding the Women's March.	Yes	Probable
John Parrott	John Parrott was Defendant Local 556's Treasurer. He will testify about the union's preparations and planning for the Women's March, including the financing of the Women's March.	Yes	Probable
Maureen Emlet	Maureen Emlet was Defendant Southwest's Labor Relations Manager. She will testify about Southwest's investigation that led to Carter's termination and the decision to terminate Carter's employment. She will also testify about Local 556 officials' and members' reporting other Recall supporters for discipline and Southwest's investigations of those reports.	Yes	Possible
Meggan Jones	Meggan Jones was Defendant Southwest's Assistant Base Manager in Denver, Colorado. She will testify about Southwest's investigation that led to Carter's termination.	Yes	Possible
Denise Gutierrez	Denise Gutierrez was Defendant Southwest's Employee Relations investigator. She will testify about Southwest's investigation that led to Carter's termination and the decision to terminate Carter's employment. She will also testify about Local 556 officials' and members' reporting	Yes	Possible

	other Recall supporters for discipline and Southwest's investigations of those reports.		
Brett Nevarez	Brett Nevarez was Defendant Local 556's Second Vice President. He will testify about employees' social media activities, including his own, union members' and officials' reporting other Recall supporters for discipline, and his involvement in Carter's disciplinary investigation.	No	Possible
Brian Talburt	Brian Talburt was a Southwest flight attendant and a Local 556 member. He will testify about employees' social media activities, including his own, and reporting other Recall supporters for discipline.	No	Possible
Edie Barnett	Edie Barnett was a Southwest Airlines HR Manager. She will testify about her involvement in the Carter investigation, and her involvement in flight attendants' social media policy issues at Southwest, including those related to the Recall.	No	Possible
Melissa Burdine	Melissa Burdine was a Southwest Airlines Labor Relations Manager. She will testify about her involvement in the Carter investigation, and her involvement in flight attendants' social media policy issues at Southwest, including those related to the Recall.	No	Possible
Brendon Conlon	Brendon Conlon was Southwest Airlines Senior Director of Labor Relations. He will testify about his involvement in the Carter investigation, and his involvement in flight attendants' social media policy issues at Southwest, including those related to the Recall.	No	Possible

Sonya Lacore	Sonya Lacore was Southwest's Vice President of In-Flight. She will testify about receiving President Audrey Stone's complaint about Carter, her involvement in the Carter investigation, and her involvement in flight attendants' social media policy issues at Southwest, including those related to the Recall.	No	Possible
Naomi Hudson	Naomi Hudson was Southwest's Senior Director of Labor Relations. She will testify about receiving President Audrey Stone's complaint about Carter, her involvement in the Carter investigation, her involvement in flight attendants' social media policy issues at Southwest, including those related to the Recall.	No	Possible
Linda Rutherford	Linda Rutherford was Senior VP of Corporate Communications for Southwest Airlines. She will testify about her involvement in the Carter investigation, and her involvement in flight attendants' social media policy issues at Southwest, including those related to the Recall.	No	Possible
Tammy Shaffer	Tammy Shaffer was a Southwest Airlines Labor Relations Manager. She will testify about her involvement in the Carter investigation, and her involvement in flight attendants' social media policy issues at Southwest, including those related to the Recall.	No	Possible
Nancy Kleburne	Nancy Kleburne was a Southwest Airlines employee and member of Southwest's Accommodations and Career Transitions Team. She will testify about her involvement in the Carter investigation, and	No	Possible

	her involvement in flight attendants' social media policy issues at Southwest, including those related to the Recall.		
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Dated: June 9, 2022

Respectfully submitted,

s/ Matthew B. Gilliam

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Certificate of Service

I hereby certify that on June 9, 2022, I electronically filed the foregoing document with the Clerk of Court by using the CM/ECF system, which will send a notice of electronic filing to all counsel of record

/s/ Matthew B. Gilliam